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**11<sup>th</sup> April 2007**

**Federal Communications Commission,  
Enforcement Bureau,  
445 12th Street, SW  
Washington, DC 20554,  
USA**

**Dear Sirs / Madam,**

**WC-Docket 05-196**

Further to your request of March 12<sup>th</sup> 2007, I am pleased to provide an update below regarding the current status of Flint Telecoms 911 / E911 Service.

We currently outsource our 911 / E911 Service to a specialist company in this field (HBF - 911 Solutions LLC) and have been working closely with them to analyse our current customer base in order to provide a detailed response to all of the questions raised by the FCC. However despite best attempts; we are unable to provide the full information required in order to meet the deadline of 11<sup>th</sup> April.

We therefore respectfully seek permission for an extension to the deadline of 11<sup>th</sup> April, in order for Flint to provide detailed answers to all of the information required by the FCC.

In the meantime, please accept my apologies for the failure to provide a comprehensive response to all the information required by the FCC. We will aim to provide these details as soon as possible; however where information is currently available, I have provided details below of our current compliance status:

- **Provision of Compliant 911 Service.**

Currently 67% of our customers (from a total of 380 users) are fully compliant with the E911 requirements.

- 100% of users have signed up to terms and conditions advising of 911 limitations,
- CPE Stickers have been provided to 100% of our users,
- 100% of users have provided Flint with their Registered Location and are unable to activate service without entering this information, which is also validated to ensure that a recognised address has been entered.

- **911 Coverage.**

The reason for our current non-compliance is that a number of users are either :

a) Located in areas where our E911 Service Provider has still to roll-out the capability which will automatically provide PSAP's with Registered Location and ANI information for customers as held on their systems.

We are currently working with our E911 Service Provider to determine timescales for rolling out their E911 PSAP coverage in areas where Flint customers are currently non-compliant.

Or

b) Users are located in areas where the PSAP does not have the capability to support the E911 Service including Registered Location and ANI information at the present time.

We are currently analysing the relevant PSAP's which are currently non-compliant for either of the above reasons and will forward this information to the FCC as soon as possible, together with expected timescales for compliance.

- **911 Routing Information / Connectivity to Wireline E911 Network**

Again, we are currently working with our E911 Service Provider to confirm that all 911 calls are being routed to the correct answering point in areas where Selective routers are utilised and will endeavour to provide this information to you as soon as possible.

- **New VoIP Customers and / or Marketing of VoIP Service in Non-Compliant areas**

Flint offer a Wholesale VoIP Service which is sold to End users through a number of Nationwide partners. We have ensured that the Service is not actively advertised or marketed for Sale in non-compliant areas and have attempted to match the acquisition of customers, with the nationwide E911 roll-out plans advised to us.

In some cases however, customers have purchased and activated the Service in areas where we were unaware that a fully compliant E911 Service was unavailable at that time for that customers location.

Note that in all such instances; customers have entered a validated Registered Location and have accepted our standard terms which advise that in some cases the Emergency Services Operator may be unaware of the 911 callers location and ANI.

Unfortunately due to E911 implementation delays, this approach has resulted in some Customers being accepted for Service in areas which are non-compliant at present. We are currently reviewing the timescales for when the full E911 Service will become available for those customers concerned and will provide full details of these timescales as soon as possible.

We are also liaising with our E911 Service Provider regarding their current PSAP roll-out plan to prevent any such re-occurrences and this information will enable

us to ensure that in future all new Customers are within areas which are already in full compliance with the FCC E911 regulations.

We aim to provide a more detailed response to the outstanding questions above, as soon as possible, however please do not hesitate to contact me should you need any further information or wish to discuss any points in the meantime.

**Yours Faithfully**

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